

# Michael Faillace & Associates, P.C.

Employment and Litigation Attorneys

60 East 42<sup>nd</sup> Street, Suite 4510  
New York, New York 10165

Telephone: (212) 317-1200  
Facsimile: (212) 317-1620

[gnydenskiy@faillacelaw.com](mailto:gnydenskiy@faillacelaw.com)

May 6, 2020

**Via Electronic Filing**

The Honorable Judge Alison J. Nathan  
U.S. District Court Southern District of New York  
500 Pearl St  
New York, NY 10007

**Re:** *Basurto et al v. Eda Food Inc. et al* – Joint Letter  
**Case No.: 1:18-cv-08858-AJN**

Dear Honorable Judge Nathan:

We represent Plaintiffs in this matter. Due to the adjournment of trial to October 19, 2020, the undersigned believes a summary judgment motion is the most efficient course. Therefore, we respectfully request permission to file a summary judgment motion to be due within 2 weeks of Your Honor's Order granting permission for the filing.

Respectfully Submitted,

s/ Gennadiy Naydenskiy  
Gennadiy Naydenskiy  
60 East 42nd Street, Suite 4510  
New York, New York 10165  
Email: [Gnydenskiy@faillacelaw.com](mailto:Gnydenskiy@faillacelaw.com)  
*Attorneys for Plaintiffs*

cc: Joshua D. Levin-Epstein, Esq.(by ECF)